UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

UNITED STATES OF AMERICA)
) DOCKET NO. 3:23-cr-176
v.)
) FACTUAL BASIS
(3) KEVIN JA'CORYEN JAMES FIELI	OS)
)

NOW COMES the United States of America, by and through Dena J. King, United States Attorney for the Western District of North Carolina, and hereby files this Factual Basis in support of the plea agreement filed simultaneously in this matter.

This Factual Basis is filed pursuant to Local Criminal Rule 11.2 and does not attempt to set forth all of the facts known to the United States at this time. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea(s) that the defendant will tender pursuant to the plea agreement, and that the facts set forth in this Factual Basis are sufficient to establish all of the elements of the crime(s). The parties agree not to object to or otherwise contradict the facts set forth in this Factual Basis.

Upon acceptance of the plea, the United States will submit to the Probation Office a "Statement of Relevant Conduct" pursuant to Local Criminal Rule 32.4. The defendant may submit (but is not required to submit) a response to the Government's "Statement of Relevant Conduct" within seven days of its submission. The parties understand and agree that this Factual Basis does not necessarily represent all conduct relevant to sentencing. The parties agree that they have the right to object to facts set forth in the presentence report that are not contained in this Factual Basis. Either party may present to the Court additional relevant facts that do not contradict facts set forth in this Factual Basis.

- 1. Beginning in 2021 and continuing until 2023, in the Western District of North Carolina and elsewhere, the defendant, Kevin Ja'Coryen Fields, ("FIELDS") knowingly and willfully conspired with Dewanne Lamar White, Garyka Vaugn Bost, Hosea Fernandez Hampton, Jr., Reginald Eugene Hill, Jr., and with other persons, to commit offenses against the laws of the United States, that is: (1) to transport and cause to be transported in interstate and foreign commerce motor vehicles, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2312; and (2) to receive, possess, store, sell, and dispose of motor vehicles, which had crossed a state boundary after being stolen, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2313.
- 2. FIELDS and his coconspirators, including White, Bost, Hampton, and Hill engaged in a scheme and conspiracy to steal high-end motor vehicles from car dealerships at various locations across the United States and transport them across state lines and to otherwise possess and sell the stolen motor vehicles that had been transported across state lines. During the

conspiracy, FIELDS and his coconspirators stole dozens of vehicles worth millions of dollars, many of which were transported to the greater Charlotte, North Carolina region.

- 3. It was part of the conspiracy that FIELDS and his coconspirators, stole motor vehicles from car dealerships located throughout the United States, including: North Carolina, South Carolina, Georgia, Florida, Tennessee, Kentucky, Alabama, Mississippi, Louisiana, Indiana, Ohio, Pennsylvania, New Jersey, New York, and Arizona.
- 4. In order to maximize their profits from the thefts, FIELDS and his coconspirators stole high-end vehicles from the victim car dealerships, including various luxury models made by Bentley, BMW, Cadillac, Infiniti, Land Rover, Mercedes-Benz, and Porsche as well as trucks and other expensive models from Chevrolet, Dodge, Ford, GMC, and Jeep.
- 5. During the conspiracy, FIELDS frequently aided and abetted the vehicle thefts by serving as a driver for one of the stolen vehicles or one of the vehicles used to transport the coconspirators to the dealership to commit the theft.
- 6. In furtherance of the conspiracy, FIELDS and his coconspirators committed the following vehicle thefts at various locations across the country:
 - a. On or about July 22-23, 2021, FIELDS, along with coconspirators, aiding and abetting each other, stole (1) a silver 2020 Dodge Challenger Hellcat, (2) a red 2020 Dodge Challenger, and (3) a maroon 2018 Dodge Charger Hellcat from two car dealerships in Davenport and Lakeland, Florida, and transported at least one of the vehicles to the Western District of North Carolina.
 - b. On or about August 24, 2021, FIELDS, along with coconspirators, aiding and abetting each other, stole (1) a black 2020 Jeep Wrangler, (2) a white 2019 Ford F350, (3) a white 2021 Ford F150, (4) a black 2018 Ford F150, (5) a silver 2017 Land Rover, (6) a 2019 silver Lincoln Navigator, and (7) a red 2021 Chevrolet Camaro SS from two car dealerships in Knoxville, Tennessee, and transported at least one of the vehicles to the Western District of North Carolina.
 - c. On or about September 16, 2021, FIELDS, along with coconspirators, aiding and abetting each other, stole multiple vehicles, including (1) a gray 2018 Mercedes-Benz S450, (2) a black 2018 Mercedes-Benz S450, (3) a white 2020 Ford F250, (4) a white 2019 Bentley Bentayga, (5) a gray 2019 BMW M5, and (6) a black 2018 BMW 750i xDrive from a car dealership in Wexford, Pennsylvania, and transported at least one of the vehicles to the Western District of North Carolina.
 - d. On or about September 24-25, 2021, FIELDS, along with coconspirators, aiding and abetting each other, stole (1) a gray 2021 Mazda CX9 TR, (2) a red 2019 GMC Sierra 3500 Denali Dually, (3) a gray Mazda CX-9 CE, (4) a white

- 2020 Infiniti QX80, (5) a black 2017 Ford Mustang GT, and (6) a blue 2020 Dodge Challenger Hellcat from two car dealerships in Panama City, Florida.
- e. On or about October 11, 2021, FIELDS, along with coconspirators, aiding and abetting each other, stole (1) a silver 2021 Chevrolet Silverado and (2) a black 2019 Ford F350, from a car dealership in Nicholasville, Kentucky.
- f. On or about October 19-20, 2021, FIELDS, along with coconspirators, aiding abetting each other, stole (1) a maroon 2018 Dodge Challenger, (2) a silver 2020 Dodge Challenger Hellcat, and (3) a white 2019 BMW X7 xDrive50i from two car dealerships in Carmel, Indiana.
- g. On or about October 29-30, 2021, FIELDS, along with coconspirators, aiding and abetting each other, stole (1) a blue 2019 Chevrolet Corvette, (2) a 2021 Ford Mustang Cobra Shelby GT 500, (3) a black 2016 Chevrolet Corvette, and (4) a white 2021 Cadillac Escalade from two car dealerships in Dublin and Columbus, Ohio, and transported at least one of the vehicles to the Western District of North Carolina.
- h. On or about November 20, 2021, FIELDS, along with coconspirators, aiding and abetting each other, stole (1) a gray 2021 Dodge Challenger and (2) a red 2021 Dodge Challenger from a car dealership in Turnersville, New Jersey.
- i. On or about November 25, 2021, FIELDS, along with coconspirators, aiding and abetting each other, stole (1) a black 2017 Infiniti Q70L and (2) a white 2018 Infiniti Q50 from a car dealership in Knoxville, Tennessee, and transported at least one of the vehicles to the Western District of North Carolina.
- j. On or about November 28, 2021, FIELDS, along with coconspirators, aiding and abetting each other, stole (1) a gray 2021 Ford Mustang GT and (2) a white 2021 BMW 550 from a car dealership in Atlanta, Georgia.
- k. On December 5, 2021, FIELDS, along with coconspirators, aiding and abetting each other, stole (1) a red 2020 Ford Mustang GT, (2) an orange 2021 Dodge Challenger, and (3) a white 2020 Dodge Challenger from two car dealerships in Somerset, Kentucky, and transported the vehicles to the Western District of North Carolina. FIELDS took photographs of the three vehicles at a parking garage in Charlotte on the same day.
- 1. On or about January 19, 2022, FIELDS, along with at least one coconspirator, aiding and abetting each other, stole a white 2018 Dodge Challenger Hellcat from a dealership in Evesham, New Jersey.

7. In furtherance of the conspiracy, FIELDS and his coconspirators stole vehicles worth in excess of \$3.5 million, an amount which was reasonably foreseeable to FIELDS. The exact number and value of vehicles stolen as part of the conspiracy is unknown to the United States as of the date of this factual basis.

DENA J. KING UNITED STATES ATTORNEY

WILLIAM T. BOZIN

ASSISTANT UNITED STATES ATTORNEY

DANIEL RYAN

ASSISTANT UNITED STATES ATTORNEY

Defendant's Counsel's Signature and Acknowledgment

I have read this Factual Basis, the Bill of Indictment, and the plea agreement in this case, and have discussed them with the defendant. Based on those discussions, I am satisfied that the defendant understands the Factual Basis, the Bill of Indictment, and the plea agreement. I hereby certify that the defendant does not dispute this Factual Basis.

Renae Alt-Summers, Attorney for Defendant

DATED: 5736/5